

**VERMONT SECRETARY OF STATE****Corporations Division**

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: www.sec.state.vt.us**1. Acknowledgement Information.**

- a. **Name:** Sherry Booles
- b. **Acknowledgement Address:** 39 Broadway, 32nd Floor, New York, NY, 10006, USA
- c. **Email Address:** sherry.booles@alc.com
- d. **Phone No:** 6049

2. Data Broker Information.

- a. **Name:** Belardi Ostroy ALC LLC
- b. **Primary Physical Address:** 39 Broadway, 32nd Floor, New York, NY, 10006, USA
- c. **Primary Email Address:** sherry.booles@alc.com
- d. **Primary Internet Address (URL):** www.belardiwong.com

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☒ Yes ☐ No*If so:***a. What was the method for requesting an opt-out?**

To opt-out of direct marketing or synchronization of offline data with online activities, Belardi provides an online form that provides consumers with an option to opt-out of both direct mail and email or email only. We require all of our cookie and related digital advertising services providers or partners to adhere to the Digital Advertising Alliance ("DAA") Self-Regulatory Principles in connection with this interest-based advertising activity and provide opt-out for interest based ad cookies

b. If the opt-out applied to only certain activities or sales, which ones?

Consumers can opt out of interest-based advertising through the DAA tool as well as direct marketing and synchronization of offline data with online activities by filling out a form and sending it back to Belardi Ostroy.

c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?

No

4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:

a. Postal and Email List Management b. Data Management and Segment Creation c. Ad Targeting Services d. Address Hygiene, Postal or Email Address Verification

5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:

Belardi Ostroy did not implement a new purchaser credentialing process during 2018.

6. The number of security breaches that the data broker experienced during the prior year: 0 .

Total number of consumers affected by the breaches: 0 .



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- 7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

Beldardi Ostroy has no knowledge nor do we allow the collection or use of data on any persons under the age of 18.

- 8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

N/A

9. Certification of Annual Registration.

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Sherry Booles
PRINTED NAME

Sherry Booles
SIGNATURE

01/31/2019
DATE